

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

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Advanced Television Systems
And Their Impact Upon The
Existing Television Broadcast
Service

MM Docket No. 87-268

To: The Commission

**SUPPLEMENT TO OPPOSITION TO PETITION FOR RECONSIDERATION
AND CLARIFICATION, AND SUPPLEMENT THERETO**

Detroit Educational Television Foundation ("Foundation"), through its attorneys, respectfully requests permission to file this Supplement to its Opposition to the Petition for Reconsideration and Clarification, and Supplement thereto, filed by Cannell Cleveland, L.P. ("Cannell") in the above-captioned proceeding. The sole purpose of this Supplement is to furnish the original of the Engineering Statement by the Foundation's engineering consultant as a substitute for the facsimile copy appended to the Foundation's Opposition. Grant of this request will not delay the Commission's consideration of this matter or prejudice any party. Accordingly, grant of this request and acceptance of the Supplement would serve the public interest.

Respectfully submitted,

DETROIT EDUCATIONAL TELEVISION
FOUNDATION

By: Robert A. Woods
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ENGINEERING STATEMENT

of

John F.X. Browne, P.E.

on behalf of the

Detroit Educational TV Foundation

licensee of

WTVS-TV

Detroit, MI

Cannell Cleveland, L.P., licensee of WUAB-TV, Cleveland, OH (Cannell) filed a supplement to its Petition for Reconsideration and Clarification¹ in which it suggests that WTVS-TV be prevented from increasing its DTV power (WTVS-DT, Channel 43) because of alleged co-channel interference to Cannell's WUAB-TV NTSC operations in Lorain, OH, also on Channel 43, at least until such NTSC operation ceases.

Cannell's engineering showing is based on a theory that anomalous propagation over and near Lake Erie (which lies between Detroit and Cleveland) will some how result in a reduction of the desired WUAB-TV signal and an increase in the WTVS-DT signal such that the C/I is reduced by as much as 6 dB. While the Commission has recognized the frequent anomalous propagation conditions in the Gulf Coastal regions (by establishing a special Zone III with increased separation criteria) it has not done so for any other area of the U.S. and specifically not for any of the Great Lakes area; this is due, in part, to the fact that the average atmospheric refractive indices for these areas do not vary widely from the average values in other parts of the country – a statement not applicable to the Gulf Coast areas.

^{1/} Re Sixth Report & Order in the Digital Television proceeding.

Cannell has presented no scientific basis for imposing such a restriction and, in fact, appears to be basing its request on anecdotal information. Furthermore, the interference calculations do not appear to be correct, even if one assumes, arguendo, that the 6 dB difference would occur. First, by inspection, virtually all of the interference from WTVS would fall over Lake Erie. Second, interference from WTVS over U.S. land areas would appear to occur only in Ottawa County (a county in the Toledo DMA, not the Cleveland DMA). The TV households in Ottawa County total 15,270 while Cannell claims that 215,000 households would be affected by WTVS under the assumed anomalous propagation conditions. Third, interference in Ottawa County will be caused by adjacent-channel interference from WGGN-DT at Sandusky, OH, which interference will be present regardless of the power being used by WTVS-DT.

Conclusion

The Commission's Rules and Regulations make no provision for "adjustments" to propagation calculations related to interference predicted in the Great Lakes area nor has the petitioner submitted any scientific basis of either the need for such adjustments or the magnitude of the adjustment assumed.

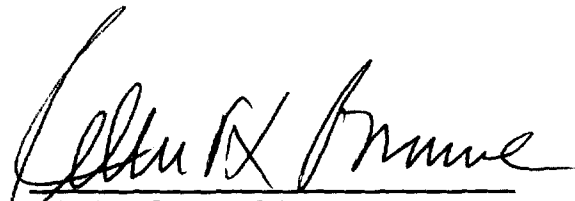
The Commission's rules already provide protection for existing NTSC stations relative to power increases proposed by DTV facilities and there is no need to impose additional restrictions.

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Certification

This statement was prepared by me or under my direction. All assertions contained in the statement are true of my own personal knowledge except where otherwise indicated and these latter assertions are believed to be true.

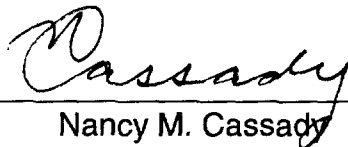

John F.X. Browne, P.E.
September 23, 1997

/kjr

CERTIFICATE OF SERVICE

I, Nancy M. Cassady, Secretary in the law offices of Schwartz, Woods & Miller, hereby certify that I have on this 24th day of September, 1997, sent by First Class United States mail, postage prepaid, copies of the foregoing **SUPPLEMENT TO OPPOSITION TO PETITION FOR RECONSIDERATION AND CLARIFICATION, AND SUPPLEMENT THERETO** to the following:

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Nancy M. Cassady